IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

FRANCIS CASTRO)
Plaintiff,) Case No. 3:22-cv-00084
V.) Judge Eli J. Richardson) Magistrate Judge Alistar Newberr
NATIONSTAR MORTGAGE, LLC, et al.)
Defendant(s))

JOINT MOTION FOR STATUS CONFERENCE

Plaintiff Francis Castro and Defendant Nationstar Mortgage LLC hereby move the Court for an Entry setting a Status Conference on this case.

In support of this Joint Motion, the Parties would state that a status conference is needed in light of the following matters:

- The need to discuss rescheduling the Jury Trial scheduled for April 16, 2024;
- The need to discuss a briefing schedule for Defendant's Motion for Partial Summary Judgment filed on February 29, 2024 (Doc. 63);
- The need to discuss a briefing schedule for Defendant's Motion to Exclude Plaintiff's Expert filed on February 29, 2024 (Doc. 64 and Doc. 65); and
- The need to discuss a forthcoming Plaintiff's Motion for Leave to File Amended Complaint due to claims identified during discovery which will include a putative class action count.

The Parties conducted a meet-and-confer on the Motion for Leave on Friday, March 8, 2024 and in light of the issues discussed related to that Motion as well as the other pending matters in this case, the Parties reasonably believe that a status conference with the Court is appropriate given the circumstances related to the Motion for Leave.

The Parties would request that any Status Conference be held at the convenience of the Court on or after March 28, 2024 due to the unavailability of counsel prior to that date. The Parties would request if possible that this conference be held remotely as incoming co-counsel for the Plaintiff, Brian D. Flick, is based out of Boston and currently has hearings on 3/25-3/26, depositions scheduled for 3/28 and 4/1, and a mediation scheduled for 3/29.

WHEREFORE the Parties jointly request a status conference and for all other relief that this Court may deem just and proper.

Respectfully submitted,

/s/ Brent S. Snyder

Brent S. Snyder, BPR #021700 DannLaw Of Counsel 2125 Middlebrook Pike Knoxville, TN 37921 (865) 264-3328 (865) 546-2777 facsimile

Keith D. Slocum (BPR No. 023024) SLOCUM LAW 370 Mallory Station Road, Suite 504 Franklin, TN 37067 Telephone: (615) 656-3344

Email: keith@keithslocum.com

Brian D Flick (0081605)* DANNLAW 15000 Madison Avenue Lakewood, OH 44107 Phone: (216) 373-0539 Facsimile: (216) 373-0536

Facsimile: (216) 373-0536 notices@dannlaw.com

*Pro Hac Vice Motion to be submitted

Counsel for Plaintiff Francis J. Castro

/s/ Lauren Paxton Roberts

(per email consent 03/12/2024) Lauren Paxton Roberts (BPR No. 025049) STITES & HARBISON PLLC

401 Commerce Street, Suite 800 Nashville, TN 37219

Telephone: (615) 782-2200

Email: lauren.roberts@stites.com

Counsel for Defendant Nationstar Mortgage

LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2024, a copy of the foregoing *Joint Motion for Status Conference* was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Brent S. Snyder
Brent S. Snyder, BPR #021700
DannLaw
Of Counsel
Co-counsel for Plaintiffs